

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION (TOLEDO)

PLUMBERS & PIPEFITTERS NATIONAL	)	Civil Action No. 3:05-cv-07393-JGC
PENSION FUND; SEIU PENSION PLANS	)	
MASTER TRUST; and WEST VIRGINIA	)	<u>CLASS ACTION</u>
LABORERS PENSION TRUST FUND, On	)	
Behalf of Themselves and All Others Similarly	)	Senior Judge James G. Carr
Situated,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
MICHAEL J. BURNS and ROBERT C.	)	
RICHTER,	)	
	)	
Defendants.	)	
	)	

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CLASS REPRESENTATIVES' MOTION FOR (1) FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT AND PLAN OF ALLOCATION OF SETTLEMENT PROCEEDS; AND (2)  
AN AWARD OF ATTORNEYS' FEES AND EXPENSES

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Lead Counsel for Plaintiffs

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that, pursuant to an Order of the Court dated July 19, 2016, on November 18, 2016, at 12:00 p.m., or as soon thereafter as counsel may be heard, at the James M. Ashley and Thomas W.L. Ashley U.S. Courthouse, 1716 Spielbusch Avenue, Toledo, Ohio, before the Honorable James G. Carr, Senior United States District Judge, Class Representatives Plumbers & Pipefitters National Pension Fund and West Virginia Laborers' Pension Trust Fund (collectively, "Class Representatives") will and hereby move for orders approving the proposed settlement of the above-captioned action, the Plan of Allocation of settlement proceeds, and awarding attorneys' fees and expenses. Class Representatives' motion is based on the accompanying Memorandum of Law in Support thereof, the Declaration of Debra J. Wyman in Support of Motion for (1) Final Approval of Class Action Settlement and Plan of Allocation of Settlement Proceeds; and (2) an Award of Attorneys' Fees and Expenses, the Declaration of Carole K. Sylvester Regarding Notice Dissemination, Publication, and Requests for Exclusions Received to Date, the declarations of counsel, the Stipulation of Settlement, all other pleadings and matters of record, and such additional evidence or argument as may be presented at the hearing.

DATED: September 16, 2016

Respectfully submitted,

ROBBINS GELLER RUDMAN  
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s/ Debra J. Wyman  
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CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2016, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 16, 2016.

s/ Debra J. Wyman

DEBRA J. WYMAN

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## **Mailing Information for a Case 3:05-cv-07393-JGC Plumbers & Pipefitters National Pension Fund, et al v. Burns, et al**

### **Electronic Mail Notice List**

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## Manual Notice List

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